

Comments

Notice of Proposed Rulemaking and Order
FCC 02-8
CC Docket No. 02-6

Submitted By:
Trillion Digital Communications, Inc.
3165 Dublin Lane
Bessemer, Alabama 35022-4823
205-874-7100
Email: jcarter@trillion21.com

Paragraph 14: Eligible Services List

It is Trillion's opinion that the pre-approved list of products and services would be far too rigid in the way of requests for conditional services. Also the timeliness of the posted information could pose a major problem by preventing applicants from getting innovative solutions and taking advantage of the latest products and services. We suggest it continue to be driven by the service provider working in conjunction with the applicants and e-rate in order to most efficiently meet the goals of the program

Paragraph 20: WAN Eligibility

Trillion holds the position that the Tennessee Order is fair and equitable. If WANs are made a Priority 2 service, the program's goal of equal distribution of funds will not be achieved. Applicants in rural America will be hurt if the decision is reversed, since they fall mostly into the 75-85 discount range, and therefore would not receive funding. We agree with the suggestion to increase the 3-year period of time over which WAN-related capital expenses must be recovered in order to lessen the burden on available funds.

Paragraph 21: Wireless Phone Eligibility

As it stands, wireline technologies are being favored over wireless technologies, and the goal of competitive neutrality is not being met. Trillion feels that the rules should be modified to make wireless phone service eligible for all eligible support staff. This would greatly reduce the chance for fraud and abuse.

Paragraph 22: Voice Mail Service for Support

Since voice mail is now a standard way of communicating, and as necessary as e-mail, Trillion holds the position that it should be included as an eligible service. The operation of the program would be improved since voice mail service for support staff would make the school or library run more efficiently. We feel this modification will not only streamline the application process, but also cut down on the instances of fraud.

Paragraph 25: Internet Content

Trillion strongly agrees with this ruling as it stands, and therefore does not support the proposed change. We feel this modification would increase fraud and abuse, rather than support competition as it does now. Since a change could entice service providers to offer only packages with content, the future choices of the applicant would be limited by no longer having internet packages without content available.

Paragraph 27: 30 Percent Benchmark

Trillion agrees with the 30 percent benchmark and suggests it continue to be

used. Because it provides an incentive to applicants to eliminate ineligible services from their requests, administrative costs will be reduced, therefore preventing waste and abuse.

Paragraph 33-34: BEAR Process

It is Trillion's opinion that the BEAR form works, but we agree that applicants should be given the option of how they will pay.

Paragraph 35: Enforcement Measures for BEAR Payment Remittal

Trillion holds the opinion that extending the repayment period beyond 20 days opens the door to much fraud and abuse. Appropriate measures should be taken, perhaps in the way of fines, should a service provider not comply.

Paragraph 40: Equipment Transferability

Trillion agrees that by limiting the transfer of equipment for internal connections for 3 years, the program incentives are better being met. More applicants will be provided funding for internal connections, which means fairer distribution of funds and prevention of waste and abuse.

Paragraph 44-47: Excess Services

Due to Alaska's unique situation and lack of infrastructure, it is Trillion's opinion that the waiver for the Alaska Order was fair and equitable. We agree that waivers should be granted on a case-by-case basis. However, we feel extreme caution should be used in awarding this process in order to prevent fraud and abuse.

Paragraph 59: Independent Audits

Trillion supports the decision to require independent audits of recipients and service providers when instances of waste, fraud, and abuse are suspected.

Paragraph 65: Unused Funds

Trillion agrees with the second option, that unused funds be distributed in subsequent years of the schools and libraries program regardless of funding caps, thereby providing additional resources for applicants and furthering the overall goals of universal services.

Paragraph 86: Appeals Process

Trillion holds the position that 60 days should be adopted as the standard time for appeals.

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